

Exhibit E

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

In re:
City of Detroit, Michigan,
Debtor.

Bankruptcy Case No. 13-53846
Judge Thomas J. Tucker
Chapter 9

Declaration of Joseph Uhl

Joseph Uhl declares as follows:

1. I am an attorney for the Trustees of the Sheet Metal Workers' Local Union No. 80 Pension Fund (the "SMW 80 Pension Fund");
2. The SMW 80 Pension Fund sent the City of Detroit an Employer Withdrawal Liability Questionnaire on July 12, 2018, which was received on August 20, 2018 (Exhibit 1);
3. The City had 30 days to respond pursuant to ERISA Section 4219(a), 29 USC §1399(a);
4. The City did not respond, so my colleague sent a demand for a response to the City's legal department on December 19, 2018 (Exhibit 2);
5. Attorney June Adams contacted this office on January 16, 2019 and legal counsel transmitted the questionnaire via e-mail (Exhibit 3);
6. Legal counsel sent a follow up letter requesting that the company provide completed responses by March 11, 2019 (Exhibit 4);

7. Legal counsel contacted Attorney Adams on April 3, 2020, who said that she did not understand the questionnaire, did not know the affected employees, and did not know what City attorney would be the appropriate attorney to respond;

8. Legal counsel obtained employee information from BeneSys and forwarded that detail to the Attorney Adams on April 16, 2019 (Exhibit 5);

9. On June 5, 2019, Attorney Adams again responded, instructing me to contact the City's Deputy CFO Pamela Scales (Exhibit 6);

10. Ms. Scales, in turn, requested that I contact the City of Detroit's Chief Deputy CFO / Finance Director, John Naglick;

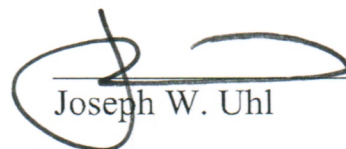
11. July 8, 2019, in response to Mr. Naglick's request, I again forwarded SMW80 Pension Fund's questionnaire and the City's corresponding contribution history (Exhibit 7);

12. Neither Naglick nor anyone at the City of Detroit responded and/or answered the questionnaire; and

13. To date, the SMW 80 Pension Fund has not received a response to the Employer Withdrawal Liability Questionnaire.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

October 1, 2020



Joseph W. Uhl